



# CORNERSTONE

Engineering Group, LLC

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VIA E-MAIL AND US MAIL

September 10, 2013

Mr. Jonathan Gorin  
Remedial Project Manager  
United States Environmental Protection Agency, Region II  
290 Broadway  
19<sup>th</sup> Floor  
New York, New York 10007-1866

Subject: Monthly Progress Report for August 2013  
LCP Chemicals, Inc. Superfund Site (USEPA ID# NJD079303020)

Dear Mr. Gorin:

The following monthly progress report is submitted on behalf of ISP Environmental Services Inc. (IES) in satisfaction of the Section VIII.35 requirements of Administrative Order No. II CERCLA-02-99-2015 (hereinafter referred to as the Order) issued by USEPA and as executed by IES on May 13, 1999.

A "Gantt Chart" project schedule is provided as an attachment (Figure 1) showing the overall project timeline through completion of the Remedial Investigation and Feasibility Study as provided for in the Order and showing the USEPA final approval dates for each, as discussed further below.

## 1. Previous Actions in Compliance with the Order

A. The following actions were taken to comply with the Order during the previous month:

- Completed preparation of the final *Remedial Investigation Report* (RIR), based on final reconciliation of remaining comments from the USEPA on the draft.
- Completed preparation of the final *Baseline Ecological Risk Assessment* (Appendix Q to the RIR) based on final reconciliation of remaining comments from the USEPA on the draft.
- The final *Human Health Risk Assessment* (Appendix P to the RIR) was previously completed and was made a part of the final RIR compilation, as described below.
- Completed preparation of the final *Feasibility Study* (FS) based on final reconciliation of remaining comments from the USEPA on the draft.

B. The following documents were submitted to the agencies during the previous month:

- Monthly progress letter report dated August 5, 2013, including an updated project schedule dated August 2, 2013.

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- The final USEPA approved RIR and including the final *Human Health Risk Assessment* (HHRA) and the final *Baseline Ecological Risk Assessment* (BERA), transmitted electronically via an electronic mail message from Scott MacMillin of Brown and Caldwell to Jon Gorin of the USEPA, dated August 19, 2013.
- The final USEPA approved FS report transmitted electronically via an electronic mail message from Gary DiPippo of Cornerstone to Jon Gorin of the USEPA, dated August 16, 2013.

C. The following agency approvals were received during the previous month:

- Approval of the final RIR in an August 12, 2013 letter from Carole Petersen of the USEPA to John Hoffman of Ashland.
- Approval of the final HHRA and BERA in an August 13, 2013 letter from Carole Petersen of the USEPA to John Hoffman of Ashland.
- Approval of the final FS in an August 14, 2013 letter from Carole Petersen of the USEPA to John Hoffman of Ashland.

D. The following agency documents and correspondences were received during the previous month:

- None during the reporting period (see approvals documentation in Section C above)

E. Other pertinent communications with the agencies during the previous month:

- None during the reporting period.

**2. Future Actions, Data, and Plans**

- A. With the USEPA approval of the RIR, HHRA, BERA, and FS, the RI/FS requirements of the Consent Order have been met, and therefore, no specific future actions have been defined at this point. To the extent that the Record of Decision (ROD) has not yet been issued, future work may be performed as relates to comments received from the public participation process and the final ROD.
- B. Other information related to the progress of work:
- None during this reporting period.

**3. Project Schedule**

- A. A schedule is attached which shows the final USEPA approval dates for the RIR, HHRA, BERA, and FS, and all tasks are shown as 100% complete. There are no other specific items that will need to be added to the schedule. The need for further schedule updates will be assessed based on future actions by the USEPA related to the ROD.
- B. Delays that have been encountered or anticipated that may affect the future schedule for completion of the work:

- The work required by the Consent Order is completed.

C. Description of efforts made to mitigate these delays or anticipated delays:

- The work required by the Consent Order is completed.

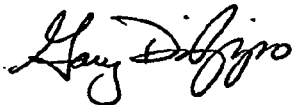
4. **Funding Mechanism**

- A. An Irrevocable Letter of Credit No. P-224827, issued by JP Morgan Bank effective April 25, 2002, and associated Standby Trust Agreement were issued in satisfaction of the financial assurance obligations of the Order as documented to USEPA in a letter from Celeste Wills, Esq. of IES, dated April 26, 2002.

If you or your staff has any questions or comments, please do not hesitate to contact John Hoffman of Ashland Inc. at 302-995-3233.

Sincerely,

CORNERSTONE ENGINEERING GROUP, LLC



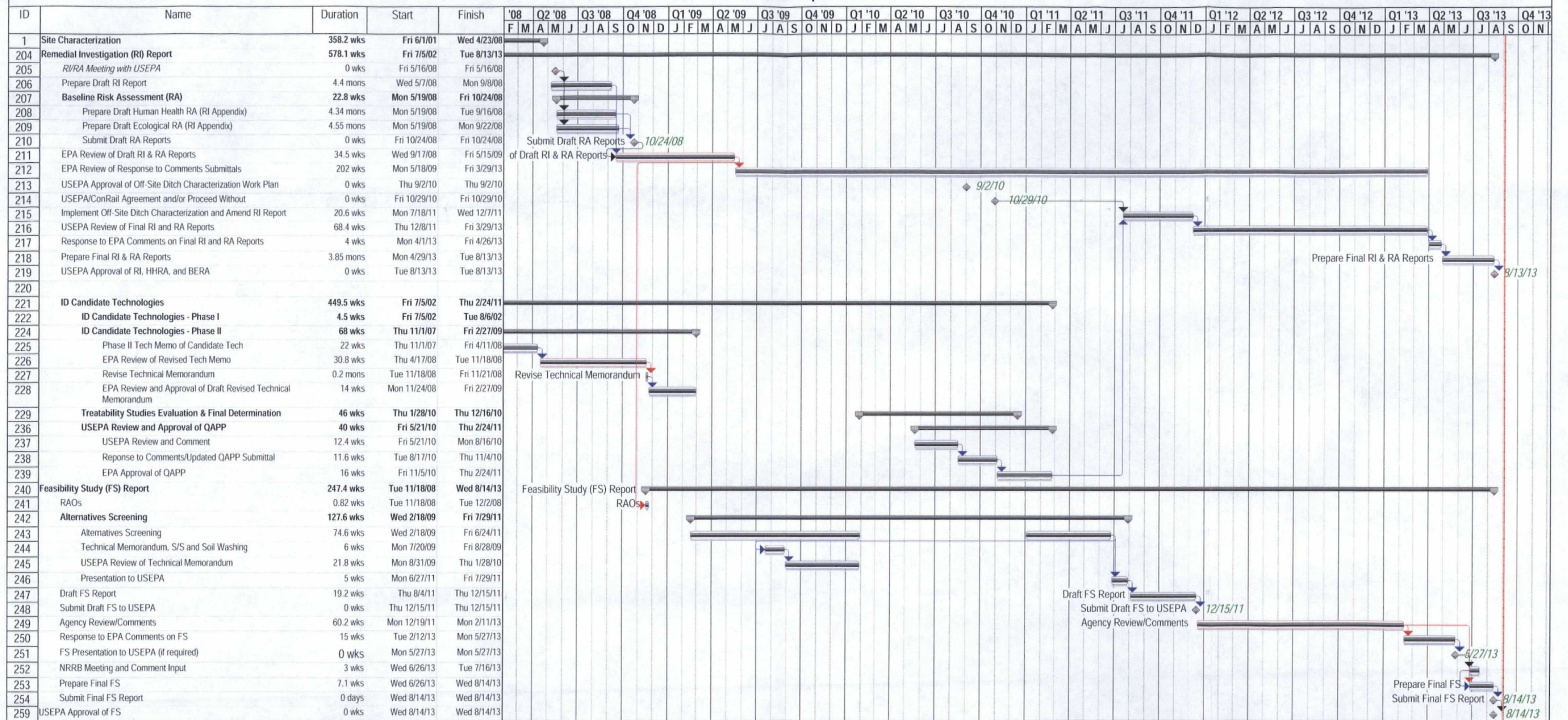
Gary J. DiPippo, P.E.  
Manager, Hydrogeology and Remediation

Enclosure

cc: J. Hoffman, Ashland Inc.	C. McGowan, EHS Support
S. Miller, NJDHSS	S. MacMillin, Brown and Caldwell
F. Cardiello, Esq., USEPA	K. Tolson, Geosyntec
D. Toft, Esq.	M. DeFlaun, Geosyntec
A. Pavelka, NJDEP	J. Kubitz, Entrix
R. Lampkin, Ashland	



Figure 1  
RI/FS PROJECT SCHEDULE  
LCP Chemicals, Inc. Superfund Site







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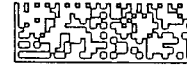
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